

Open Meeting Agenda Item



**SIERRA
CLUB**

Grand Canyon Chapter • 514 W. Roosevelt

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Arizona Corporation Commission

DOCKETED

December 14, 2018

DEC 14 2018

DOCKETED BY

Chairman Tom Forese

Commissioners Bob Burns, Boyd Dunn, Justin Olson, and Andy Tobin

Arizona Corporation Commission

1200 W. Washington Street

Phoenix, Arizona 85007

Re: Biomass, #E-00000Q-17-0138

RECEIVED
ARIZONA CORPORATION COMMISSION
1200 W. WASHINGTON ST.
PHOENIX, AZ 85007
2018 DEC 14 P 12:28

Dear Chairman Forese and Commissioners:

Thank you for the opportunity to comment on Forest Bioenergy. Please consider these comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our 70,000 members and supporters in Arizona, many of whom are customers of utilities regulated by the Arizona Corporation Commission (ACC).

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club and our members have a significant interest in this proposal as it has the potential to do more harm than good and to shift dollars from truly clean energy to an uneconomical energy source.

While biomass is a renewable energy resource, it is not necessarily a *clean* energy resource. In addition to the environmental impact of removing massive numbers of trees from Arizona forests and transporting them significant distances to burn in power plants, biomass is not carbon neutral. As noted in a *Scientific American* article, burning biomass could actually increase carbon emissions,¹ at least in the short-term, which is critical. As has also been repeatedly demonstrated, biomass is also not cost-effective. While we agree with increasing the resiliency of Arizona's forests and thinning them strategically, we do not see biomass as a viable or appropriate way to address that. Further, it is important to recognize the differences in our forest types and their fire cycles, including the fire-adapted ponderosa pine ecosystem. Fire plays a critical role in the health of the ponderosa pine forests and is essential to helping to limit the growth of dense thickets of trees and promotion of the growth of grasses and forbs.

Frequently the costs and the carbon emissions of transporting biomass are not considered. Both can be substantial. Especially at a time when truly clean renewable sources such as solar and wind are cost-competitive with other energy resources, we question proposals to subsidize biomass. One other consideration regarding biomass would be, is there a better way to utilize these smaller diameter trees? Are there ways to produce products that do not send more emissions into the air, but keep the carbon embedded?

We appreciate the ACC looking at the health of Arizona forests, holding workshops on biomass, and evaluating a path forward relative to biomass, but encourage you to focus your efforts on truly clean energy resources such as solar, wind, and energy efficiency, and on integrating energy storage and electric vehicles, and away from outdated energy resources that rely on fossil fuels and combustion.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sandy Bahr', with a long horizontal flourish extending to the right.

Sandy Bahr

Chapter Director

Sierra Club – Grand Canyon Chapter

<https://www.scientificamerican.com/article/congress-says-biomass-is-carbon-neutral-but-scientists-disagree/>